

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**SECURITIES AND EXCHANGE  
COMMISSION,**

**Plaintiff,**

**v.**

**BONAN HUANG  
NAN HUANG,**

**Defendants.**

**Case No. 2:15-cv-00269-MAK**

**Jury Trial Demanded**

**JOINT MOTION AND STIPULATION TO AMEND THE  
JANUARY 21, 2015, TEMPORARY RESTRAINING ORDER FREEZING  
ASSETS, GRANTING OTHER RELIEF, AND TO SHOW CAUSE**

The parties hereby jointly move and stipulate to the continuance of the February 3, 2015 order to show cause hearing until February 27, 2015, and respectfully request that the Court grant the relief set forth in more detail below:

WHEREAS, on January 22, 2015, and January 23, 2015, respectively, plaintiff Securities and Exchange Commission (the “Commission”) served defendants Bonan Huang and Nan Huang with the Complaint and Summons in this action;

WHEREAS, on January 22, 2015, the Commission served defendants Bonan Huang and Nan Huang with the Temporary Restraining Order Freezing Assets, Granting Other Relief, and To Show Cause, dated January 21, 2015 (the “Order”) and related papers;

WHEREAS, on January 22, 2015, the Commission served its First Set of Documents, Electronically Stored Information, and Tangible Things Requested and First Set of Interrogatories on defendants Bonan Huang and Nan Huang;

WHEREAS, on January 23, 2015, the Commission noticed defendants Bonan Huang and Nan Huang for deposition on January 29, 2015, which the Commission has agreed to continue

until Monday, February 2, 2015, while awaiting the Court's ruling on this Joint Motion and Stipulation;

WHEREAS, on January 26, 2015, defendants Bonan Huang and Nan Huang retained Gregory Morvillo, Esq. of Morvillo LLP, One World Financial Center, 27th Floor, New York, NY 10281, to represent them in this matter;

WHEREAS, on January 28, 2015, defendants Bonan Huang and Nan Huang retained Mark Billion, Esq. of Billion Law, 1650 Market Street, Suite 3600, Philadelphia, PA 19103, to represent them in this matter;

WHEREAS, defendants' counsel desires additional time to respond to the discovery served in this matter and to prepare for the Order to Show cause hearing, currently set for February 3, 2015, at 3:00 p.m., and consents to the continuation of the Order. Fed. R. Civ. P. 65(b)(2); Richmond Tech., Inc. v. Aumtech Bus. Solutions, No. 11-CV-02460-LHK, 2011 WL 2607158, at \*23 (N.D. Cal. July 1, 2011) (extending temporary restraining order's 14-day period based on consent of the adverse party).

NOW, THEREFORE, THE PARTIES JOINTLY MOVE, STIPULATE, AND RESPECTFULLY REQUEST THAT THE ORDER BE AMENDED AS FOLLOWS:

Paragraph I of the Court's January 21, 2015 Order is amended to reflect "... that Bonan Huang and Nan Huang show cause, if there be any, to this Court at 3 p.m. on the 27<sup>th</sup> day of February 2015 . . . ."

Paragraph III of the Court's January 21, 2015 Order is amended to reflect "... that Bonan Huang and Nan Huang shall deliver any opposing papers in response to the Order to Show Cause by no later than February 13, 2015, at 5:00 p.m."

Paragraph III of the Court's January 21, 2015 Order is amended to reflect that "The Commission may have until February 20, 2015, at 5 p.m., to serve, by the most expeditious means available, any reply papers upon counsel for Bonan Huang and Nan Huang."

The terms of January 21, 2015 Order shall remain in effect until otherwise superseded or amended by subsequent Order of this Court.

Dated: January 29, 2015

Respectfully submitted,

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